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November 15, 2005

Ms. Jan Palumbo, RCRA Project Manager  
United States EPA, Region 10  
1200 Sixth Avenue, Mail Stop WCM-121  
Seattle, WA 98101

Subject: **November 15, 2005, Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the November 15, 2005, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from October 15, 2005, to November 15, 2005.

#### **Significant Developments This Period**

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Baxter continued the Nonaqueous Phase Liquid (NAPL) Study in accordance with the Nonaqueous Phase Liquid Investigation Work Plan.
- On October 25, 2005, Baxter submitted to EPA the Revised Supplemental Dissolved-Phase Groundwater Monitoring Plan.
- On November 2, 2005, Baxter met with EPA to discuss the preliminary results from the NAPL investigation and potential remedial alternatives for NAPL recovery.
- On November 3 & 4, 2005, Baxter conducted groundwater sampling in accordance with the Revised Supplemental Dissolved-Phase Groundwater Monitoring Plan.

#### **Anticipated Developments Next Period**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to inform EPA of progress with the NAPL Study, remedial alternative evaluation, and groundwater monitoring activities during the next reporting period.



### Anticipated Problems and Problem Resolution

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

- No new problems or issues have been identified at the facility.

### Other Information

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- The Consent Agreement and Final Order in RCRA Docket # 10-2005 -0229 includes supplemental environmental projects (SEP). The contract for the SEP has been signed and the contractor is preparing the drawings for submittal to the City of Arlington to obtain the required permits.

### Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



Name: RueAnn Thomas  
Title: Environmental Programs Director  
Date: November 15, 2005

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas  
Environmental Programs Director

cc: Jeanne Tran, Ecology  
Georgia Baxter, J. H. Baxter & Co.  
Mary Larson, J. H. Baxter & Co.  
J. Stephen Barnett, Premier Environmental Services, Inc.